

Unified Program Newsletter – November 2025

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CalEPA

CalARP Training

In the beginning of October, CalEPA conducted training for three CUPAs that were in need of beginner/intermediate level training in the CalARP program. The training provided was very successful and interactive, the in-person aspect provided a space to answer questions, clear any misconceptions about the program and engage directly with the CUPAs. Following the training, CalEPA attended a CalARP inspection lead by the local CUPA. During this inspection CalEPA was able to provide education, make observations and answer questions directly from the CUPA's and the stationary source operators. This was done by completing a site walk through and documentation review, both on and offsite. The training and inspection created positive collaboration between CalEPA, the CUPA's and industry. CalEPA is excited to continue to conduct more trainings for CUPA's in the future.

Updates to IIAR Requirements

CalEPA would like to remind CUPAs of the American National Standards Institute-International Institute of All-Natural Refrigeration (ANSI-IIAR) 9 requirements that come into effect Jan 1, 2026, for CUPA's who have program 2 and 3 ammonia refrigeration

stationary sources in their jurisdiction. Stationary source owners/operators should be aware of these requirement updates. To learn more visit: <https://www.iicar.org/>.

If you have any questions please reach out to Alexa Kostrikin, alexa.kostrikin@calepa.ca.gov.

State Water Board

Storage of Gasoline Containing 15 Percent Ethanol

The State Water Resources Control Board (State Water Board) sent a [notice](#) to the underground storage tank (UST) community (<https://www.waterboards.ca.gov/ust/docs/2025/ust-e15-letter.pdf>) that effective October 2, 2025, Health and Safety Code has been amended to allow the sale of gasoline blends containing up to 15 percent ethanol by volume (E15) in California (Stats. 2025, ch. 247 ([Assembly Bill 30](#) (<https://legiscan.com/CA/text/AB30/id/3191091>)). This gasoline blend will be made available alongside existing ethanol gasoline blends and must comply with all other applicable UST requirements.

Owners or operators of USTs planning to store E15 must demonstrate compatibility with E15 in accordance with Title 23, chapter 16 (UST Regulations) and submit compatibility documentation 30 days prior to changing the fuel to E15. Approximately 5,000 USTs in California are not compatible with fuels containing more than 10 percent ethanol (E10). A number of UST components, including older (pre-2000) flex piping, line leak detectors, and turbines may not be incompatible with alcohol concentrations above E10. Any component for which compatibility cannot be demonstrated must be replaced with a compatible component before storing a new substance.

For questions regarding E15 gasoline or compatibility, please contact: Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov.

Chapter 16 Rewrite Update

The Office of Administrative Law completed their review of the Chapter 16 rulemaking package and filed their approval with the Secretary of State on October 28, 2025. The amended regulations become effective on January 1, 2026.

For your convenience, a courtesy copy of Chapter 16, including the new downloadable forms, is available on the [Chapter 16 website](#) (https://www.waterboards.ca.gov/ust/leak_prevention/chapter16/rewrite.html) under [Adopted Regulations](#) (https://www.waterboards.ca.gov/ust/leak_prevention/chapter16/docs/ccr23-chapter-16-2026.pdf).

For additional information regarding the Chapter 16 rulemaking, contact: Austin Lemire-Baeten at (916) 327-5612 or Austin.Lemire-Baeten@waterboards.ca.gov

Sampling Requirements for UST Closure

Some Unified Program Agencies (UPAs) are requiring sample analyses that are incorrect or incomplete when issuing UST closure permits. As a result, the Regional Water Quality Control Boards must request additional samples from owners and operators of closed UST systems, often after new USTs have been installed.

UPAs must contact the appropriate Cleanup Oversight Agency prior to sampling to ensure that all constituents, based on tank contents, are included in the analysis. As part of the Chapter 16 modification effective January 1, 2026, the regulations specifically require that sampling be conducted in accordance with the Cleanup Oversight Agency's requirements. If sampling requirements are included as part of the closure permit, they must align with those specified by the Cleanup Oversight Agency and Chapter 16.

Additionally, the sampling requirements for UST closures have changed effective January 1, 2026. Samples must be collected a minimum of two feet into native soil, immediately beneath:

- Each end of the tank
- The midpoint of each tank with a capacity greater than 12,000 gallons
- Each internal bulkhead of compartmented tanks
- All hazardous substance piping at 20 linear-foot intervals, with additional samples collected at each change in direction for rigid piping; and
- Each dispenser

For questions regarding UST closure sampling, please contact:

Dayna Cordano at (916) 341-5385 or, Dayna.Cordano@Waterboards.ca.gov.

GeoTracker UST Closure/Unauthorized Release Reporting Module

In preparation of the new reporting requirement for UST closures in UST Regulations, State Water Board staff have developed a new reporting module within the GeoTracker system. This feature is now available on the [GeoTracker website](https://geotracker.waterboards.ca.gov/ust_tank_tool) (https://geotracker.waterboards.ca.gov/ust_tank_tool). UPA staff are encouraged to become familiar with the program by voluntarily submitting permanent UST closures and reportable unauthorized releases through this module until the end of 2025. Beginning January 1, 2026, with the implementation of the amended UST Regulations, all UPAs will be required to submit this information through the GeoTracker reporting module.

For questions regarding this new reporting module, please contact: GeoTracker Help Desk at geotracker@waterboards.ca.gov.

Modifications to the Local Guidance Website

With the changes to the UST Regulations and the permanent closure of all single-walled USTs, many existing guidance documents are now outdated. State Water Board staff are currently updating the Local Guidance (LG) website. This includes removing obsolete LG letters, updating or drafting new LG letters, and reorganizing certain LG letters. Some well-known LG letters, such as LG 113 and LG 105, will no longer appear as

LG letters but will instead be posted under separate [webpages](#) titled *Release Detection Equipment and Methods for Underground Storage Tanks* and *Licensed Tank Testers and Tank Testing Companies*

(https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.waterboards.ca.gov%2Fwater_issues%2Fprograms%2Fust%2Fleak_prevention%2Figs%2Fdocs%2F105-10.xlsx&wdOrigin=BROWSELINK), respectively.

LG 200 – Report 6 and Technical Compliance Rate

Formerly LG 164, the Report 6 and [Technical Compliance Rate](#) (https://www.waterboards.ca.gov/ust/leak_prevention/lgs/docs/lg200.pdf) guidance document was updated to clarify reporting requirements of the Semi-Annual Underground Storage Tank Program Report (Report 6). The update removes the airport hydrant system reporting requirement and provides additional clarification on the reissuance of Technical Compliance Rate (TCR) violations and the timeframe for reporting red tags.

For questions regarding LG 200, or Report 6, please contact:
Magnolia Busse at (916) 341-5870 or Magnolia.Busse@waterboards.ca.gov.

LG 201 – Acceptable Local Ordinances for the Underground Storage Tank Program

The State Water Board has posted [LG 201](#) - *Acceptable Local Ordinances for the Underground Storage Tank Program* (https://www.waterboards.ca.gov/ust/leak_prevention/lgs/docs/lg201.pdf). This letter clarifies local ordinance requirements and outlines the process for formal Board approval of any UST design and construction standards that go beyond those required in Health and Safety Code, chapter 6.7 (H&SC 6.7) and UST Regulations.

The State Water Board recommends that all UPAs review their current local ordinances to ensure alignment with H&SC 6.7 and UST Regulations. UPAs must immediately stop implementing any inconsistent local ordinances or additional design and construction standards and begin the process of rescinding their local ordinances. Evaluation staff will review all local ordinances as part of the UPA evaluation process.

For questions regarding LG 201 or local ordinances, please contact:
Tom Henderson at (916) 319-9128 or Tom.Henderson@waterboards.ca.gov.

Office of Tank Tester Licensing Webpage

The Office of Tank Tester Licensing (OTTL) has updated *List of State Water Board License Tank Testers* (formerly LG 105) on the [OTTL website](#) (https://www.waterboards.ca.gov/ust/tank_testers/) to reflect the current list of State Water Board licensed tank testers. The website also provides access to OTTL Regulations, OTTL testing notification forms, and a link to the *Release Detection Equipment and Methods for Underground Storage Tanks* (formerly LG 113) website. In addition, licensing information for applicants and study materials for the exam are available.

For additional information regarding the OTTL website updates, contact: Kaitlin Cottrell at (916) 319-0742 or Kaitlin.Cottrell@waterboards.ca.gov.

Facility Compliance Inspection Reporting

UST Regulations section 2713(d) requires UPAs to report to the State Water Board, by January 31 each year, the number of UST facilities where a compliance inspection was not conducted during the previous calendar year. Beginning January 1, 2026, this requirement will be located in section 2692(b) of the amended UST Regulations. The State Water Board must also report annually to the United States Environmental Protection Agency on several performance measures under the Energy Policy Act of 2005 (EPAAct), including certification that all UST facilities comply with the federal inspection frequency requirement.

The State Water Board recommends that UPAs use the [UST Routine Inspection Frequency](#)

(<https://cersregulator2.calepa.ca.gov/Account/SignIn?ReturnUrl=%2fReports%2fUSTRouteInspectionFrequencySearch>) search tool in the California Environmental Reporting System (CERS) to verify the accuracy of UST facility compliance inspections. On October 17, 2025, the State Water Board provided a [letter](#) (<https://www.waterboards.ca.gov/ust/docs/ust-compliance-inspection.pdf>) to UPA Managers that included instructions for utilizing the search tool. UPAs should use this tool in advance to identify facilities where a compliance inspection has not been performed during the 2025 calendar year and to verify that accurate data has been reported to CERS. This report will assist UPAs in identifying missing inspections or inaccurate data. UPAs should run the CERS UST Routine Inspection Frequency search now and again in mid-December.

For information regarding compliance inspection reporting requirements, contact: Magnolia Busse at (916) 341-5870 or Magnolia.Busse@waterboards.ca.gov.

Public Records Information Webpage

In addition to the UST compliance inspection reporting, the EPAAct requires states to provide an annual summary that is available to the public. This summary must include the number of current UST facilities, UST systems, inspections performed, and information on unauthorized releases. On November 1, 2025, the State Water Board published the [Public Records Summary Information](#) of Underground Storage Tanks web page (https://www.waterboards.ca.gov/ust/leak_prevention/public_record_sum_info.html). The summary covers the reporting period from July 1, 2024, through June 30, 2025, and includes the percentage of UST systems in compliance with the TCR performance measures.

For information regarding the public records web page, contact: Magnolia Busse at (916) 341-5870 or Magnolia.Busse@waterboards.ca.gov.

Red Tag Data

The State Water Board has updated the red tag application data and significant violations by type on the [Red Tag Requirements and Guidance webpage](#)

(https://www.waterboards.ca.gov/ust/enforcement/red_tag_regs_index.html), using information provided from the January through June 2025 Report 6. Between July 1, 2024, to June 30, 2025, 34 UPAs applied red tags to 239 USTs.

For additional information on red tag application data, contact:
Magnolia Busse at (916) 341-5870 or Magnolia.Busse@waterboards.ca.gov.

Cal FIRE OSFM

Thinking About Power Washing Your Aboveground Storage Tank?

Power washing to clean aboveground storage tanks (AST) can be done, but it must be done carefully. For more information on this topic, visit the Steel Tank Institute (STI) – Steel Plate Fabricators Association (SPFA) website at <https://stispfa.org/resource/is-it-safe-to-power-wash-an-aboveground-storage-tank/>.

Emergency Generators

Question: Are emergency generators exempt or excluded under the Aboveground Petroleum Storage Act (APSA)?

Answer: There is no exemption or exclusion if the generator has the capacity to store **55 gallons or more of petroleum**.

Question: What about a generator that stores less than 55 gallons of petroleum and is in a basement?

Answer: This is considered a 'tiny' tank in an underground area (TIUGA). Although tiny TIUGAs are not required to be included in a Spill Prevention, Control, and Countermeasure (SPCC) Plan, APSA requires tiny TIUGAs to have secondary containment, be inspected monthly, and the owner or operator maintains the inspection records.

For more information on TIUGAs, refer to OSFM website at <https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency/aboveground-petroleum-storage-act/tank-in-an-underground-area-tiuga>.

For more information on APSA, visit the OSFM website at <https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/certified-unified-program-agency/aboveground-petroleum-storage-act>.

For more information on the Federal SPCC rule, visit the U.S. Environmental Protection Agency website at <https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations>. The SPCC Guidance for Regional Inspectors is available at <https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/spcc-guidance-regional-inspectors>.

References or links to information cited in this newsletter are subject to change. CalEPA is interested in your comments and suggestions regarding the Unified Program monthly newsletter. Please email your comments and suggestions to: cupa@calepa.ca.gov.

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